

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN OPEN COURT  
U.S.D.C. Atlanta

MAY 18 2015

JAMES N. HATTEN, Clerk  
By:  Deputy Clerk

UNITED STATES OF AMERICA

v.

MICHAEL C. FORD

Criminal Action No.  
1:15-MJ-386

**Government's Motion for Detention**

The United States of America, by counsel, John A. Horn, Acting United States Attorney, and Kamal Ghali, Assistant United States Attorney for the Northern District of Georgia moves for detention under 18 U.S.C. §§ 3142(e) and (f).

**1. Eligibility of Case**

This case is eligible for a detention order because this case involves:

A serious risk that the defendant will flee;

A serious risk that the defendant will obstruct or attempt to obstruct justice;

A serious risk that the defendant will threaten, injure, or intimidate a prospective witness or juror, or attempt to do so.

**2. Reason for Detention**

The Court should detain defendant because there are no conditions of release that will reasonably assure the defendant's appearance as required or reasonably assure the safety of any other person and the community.

**3. Rebuttable Presumption**

The United States does not invoke the rebuttable presumption in favor of detention.

#### **4. Time for Detention Hearing**

The United States requests the Court conduct the detention hearing on Thursday May 21, 2015. The United States requests leave of Court to supplement this motion with additional grounds or presumptions for detention.

Dated: May 18, 2015.

Richard Russell Federal Building  
75 Spring Street S.W., Suite 600  
Atlanta, Georgia 30303-3309  
Phone: (404) 581-6000  
Fax: (404) 581-6181

Respectfully submitted,

JOHN A. HORN  
ACTING UNITED STATES  
ATTORNEY

/s/KAMAL GHALI  
Assistant United States Attorney  
Ga. Bar No. 805055  
kamal.ghali@usdoj.gov

**Certificate of Service**

This motion was hand delivered to defense counsel on May 18, 2015.